

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PUBLIC EMPLOYEES' RETIREMENT
ASSOCIATION OF COLORADO, TENNESSEE
CONSOLIDATED RETIREMENT SYSTEM,
SJUNDE AP-FONDEN, FJÄRDE AP-FONDEN,
and PENSIONS KASSERNE
ADMINISTRATION A/S, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CITIGROUP INC., CHARLES O. PRINCE,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN, TODD S. THOMSON, ROBERT
DRUSKIN, THOMAS G. MAHERAS, MICHAEL
STUART KLEIN, DAVID C. BUSHNELL, JOHN
C. GERSPACH, STEPHEN R. VOLK, GEORGE
DAVID and KPMG LLP,

Defendants.

No.

TILLIE SALTZMAN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

Electronically Filed

No. 1:07-cv-9901(SHS)

ECF CASE

LENNARD HAMMERSCHLAG, Individually, and
On Behalf of All Others Similarly Situated,

Plaintiff

v.

CITIGROUP INC., CHARLES PRINCE, SALLIE
KRAWCHECK, and GARY CRITTENDEN,

Defendants.

Electronically Filed

No. 1:07-cv-10258(SHS)

ECF CASE

DECLARATION OF ANDREW J. ENTWISTLE

I, the undersigned, Andrew J. Entwistle, do hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. I am an attorney licensed to practice law in the United States Supreme Court and the State and Federal courts serving the States of Colorado, Illinois, New Jersey, New York, and Texas, and the District of Columbia. I am the managing partner of the law firm of Entwistle & Cappucci LLP (“Entwistle & Cappucci”), counsel for Public Employees’ Retirement Association of Colorado, Tennessee Consolidated Retirement System, Sjunde AP-Fonden, Fjärde AP-Fonden, and Pensionskassernes Administration A/S (together, the “Global Pension Funds”). Entwistle & Cappucci’s principal office is located at 280 Park Avenue, 26th Floor, New York, New York 10017.

2. I submit this Declaration in support of The Global Pension Funds’ Motion For an Order Partially Lifting The Private Securities Litigation Reform Act of 1995 (“PSLRA”) Discovery Stay, as set forth in Section 21D(b)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(b)(3)(B).

3. Attached hereto as Exhibit A is a true and correct copy of the House Conference Report No. 104-369, *reprinted in* 1995 U.S.S.C.A.N. 730.

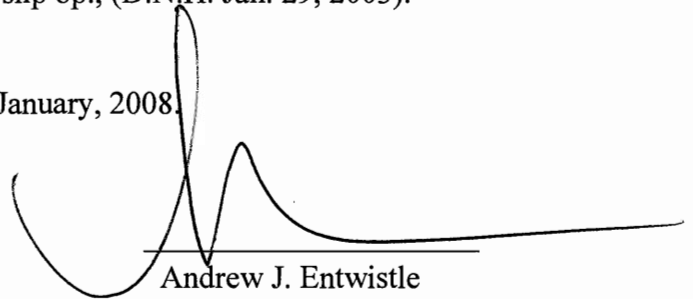
4. Attached hereto as Exhibit B is a true and correct copy of *Newby v. Enron Corp.*, Civil Action No. H-01-3624 Consolidated Cases, slip op., (S.D. Tex. Aug. 15, 2002).

5. Attached hereto as Exhibit C is a true and correct copy of *Newby v. Enron Corp.*, Civil Action No. H-01-3624 Consolidated Cases, slip op., (S.D. Tex. Feb. 27, 2002).

6. Attached hereto as Exhibit D is a true and correct copy of Senate Report No. 104-98 (1995), *reprinted in* 1995 U.S.C.C.A.N. 679.

7. Attached hereto as Exhibit E is a true and correct copy of *In re Tyco, Int'l Ltd. Multidistrict Litig.*, MDL No. 02-1335-B, slip op., (D.N.H. Jan. 29, 2003).

EXECUTED on the 7th day of January, 2008.



Andrew J. Entwistle